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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

15 American Civil Liberties Union of San
16 Diego and Imperial Counties, American
17 Civil Liberties Union of Southern
18 California, Anne Lai and Sameer Ashar,
19 Plaintiffs,

20 v.

21 United States Department of Homeland
22 Security, United States Customs and
23 Border Protection,
24 Defendants.

Case No.: 8:15-cv-00229-JLS-RNB

Joint Status Report

25 In this Freedom of Information Act (“FOIA”) action, Plaintiffs seek
26 production of records related to the United States Border Patrol’s “roving patrol”
27 operations in the San Diego and El Centro Sectors. As previously reported, *see*
28 Dkt. Nos. 28, 30, the parties have been meeting and conferring regarding the scope
of issues to be presented to the Court on contemplated cross-motions for summary

1 judgment. In accordance with the Court's order vacating the previously set
2 schedule for briefing summary judgment, *see* Dkt. No. 31, the parties respectfully
3 submit this joint status report to advise of their progress and propose next steps.

4 The parties respectfully request additional time to continue working
5 cooperatively to clarify and streamline the issues ultimately litigated. Since the
6 parties' previous report to the Court on February 11, the defendants have conducted
7 additional searching and are conducting additional processing of records for release,
8 along with preparing an updated draft *Vaughn* index for a portion of their
9 production in order to facilitate the parties' discussions. In tandem, the parties are
10 continuing to exchange correspondence. The parties believe that continuing this
11 cooperative effort may be productive in further narrowing or eliminating issues in
12 this case, sharpening the presentation of remaining issues to the Court, and
13 minimizing the Court's burden in adjudicating summary judgment. To enable
14 further cooperation, without causing undue delay, the parties respectfully propose
15 to file a joint status report no later than **April 8, 2016** in which they will report
16 progress and propose next steps. A proposed order is attached for the Court's
17 consideration.

18 Pursuant to L.R. 5-4.3.4(a)(2)(i), I, Arjun Garg, attest that all other
19 signatories listed, and on whose behalf the filing is submitted, concur in the filing's
20 content and have authorized the filing.

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22 DATED: March 18, 2016

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28 /s/ Arjun Garg

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